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*Attorneys for Defendant*  
Klondex Gold & Silver Mining Company

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

SHEILA OBIETA, an individual,  
  
Plaintiff,

v.

KLONDEX GOLD & SILVER MINING  
COMPANY, a domestic corporation;  
DOES I-X; ROE Corporations I-X,  
  
Defendants.

CASE NO. 2:20-CV-01993-JAD-EJY

**STIPULATION AND ~~PROPOSED~~ ORDER  
EXTENDING RESPONSIVE PLEADING  
DEADLINE**

**(First Request)**

WHEREAS, pursuant to an Acceptance of Service between the parties, the deadline for Defendant Klondex Gold & Silver Mining Company (“Klondex”) to answer or otherwise respond to the complaint filed by Plaintiff Sheila Obieta (“Obieta”) is January 4, 2021.

WHEREAS, due to the recent holidays, Klondex requires additional time to complete its answer to Plaintiff’s 101-paragraph complaint;

WHEREAS, the parties have agreed to a two (2)-week extension of the above deadline for these reasons;

NOW, THEREFORE, THE PARTIES, by and through their respective counsel of record, **STIPULATE AND AGREE** as follows:

1. The deadline for Klondex to respond to Plaintiff’s complaint, currently scheduled for

January 4, 2021, is continued to January 19, 2021.

2. No other deadlines will be affected.

Pursuant to LR IA 6-1, the parties state that no previous extensions have been sought, of any deadline, in this case.

Good cause exists for this extension, as the recent holidays have disrupted Klondex's ability to complete its response to Plaintiff's 101-paragraph complaint. Pursuant to LR 26-3, the parties note that no discovery in this matter has been completed, since the parties are still in the pleading stage of the case. The parties do not anticipate difficulty in completing discovery within the statutory 180 days.

**IT IS SO STIPULATED.**

DATED this 4<sup>th</sup> day of January, 2021

HKM EMPLOYMENT ATTORNEYS LLP

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Attorneys for Defendant  
Klondex Gold & Silver Mining Company

**IT IS SO ORDERED**

this 4<sup>th</sup> day of January, 2021:

  
UNITED STATES MAGISTRATE JUDGE